

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)	
)	
Plaintiff,)	No.: 23-cv-1851
)	
v.)	
)	Hon. Jeffrey T. Gilbert
Cook County Sheriff Thomas Dart, et al.)	
)	
Defendants.)	
)	

**DEFENDANTS' AGREED MOTION FOR EXTENSION OF TIME FOR PLAINTIFF'S
REPLY IN SUPPORT OF HIS MOTION FOR PERMANENT INJUNCTIVE RELIEF**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 6(b), and for Defendants' Agreed Motion for Extension of Time for Plaintiff's Reply in Support of his Motion for Permanent Injunctive Relief, state as follows:

1. Counsels for all parties have been in communication regarding this Motion, and are in agreement as to the requested extension.
2. On April 6, 2024, Plaintiff filed his Motion for Permanent Injunctive Relief with the Court. ECF No. 72.
3. On May 24, 2024, Defendants filed their Response in Opposition to Plaintiff's Motion, including as an exhibit a declaration from Eric Davis, the Deputy Director of the Department of Capital Planning and Policy for Cook County, Illinois. ECF No. 82, 82-1.
4. At present, Plaintiff's Reply in Support of his Motion is due on June 7, 2024. ECF No. 76.

5. Plaintiff has now expressed interest in deposing declarant Eric Davis for use in drafting his brief and has therefore requested an extension of time to complete his Reply in order to utilize testimony gained from said deposition in its drafting.
6. Accordingly, the parties now request a 22 (twenty-two) day extension, until June 28, 2024, for Plaintiff to file his Reply in Support of his Motion for Permanent Injunctive Relief.
7. Under Rule 6(b), this Court may, for good cause, extend the time “[w]hen an act may or must be done.” Fed. R. Civ. P. 6(b).
8. Not granting an extension of time would prejudice Plaintiff because the current deadline will not allow sufficient time to properly prepare and submit his brief.
9. The extension will grant Plaintiff the necessary time to conduct the Zoom deposition of Eric Davis, currently scheduled to take place on 6/4 and 6/5, starting at 2 PM each day.
10. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as follows:

1. The Agreed Motion for Extension of Time is granted;
2. Plaintiff’s Reply in Support of his Motion for Permanent Injunctive Relief shall be filed on or before June 28, 2024; and
3. Any other such relief as this court deems reasonable and just.

Respectfully Submitted,

Defendants

By: /s/ Zachary G. Stillman
Zachary G. Stillman, One of the
Attorneys for Defendants

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that the Agreed Motion for Extension of Time for Plaintiff's Reply in Support of his Motion for Permanent Injunctive Relief was filed on May 29, 2024, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman